

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)
v.) Case No. 3:21cr42
KEITH RODNEY MOORE,)
Defendant)

**CONSENT MOTION TO TEMPORARILY MODIFY RELEASE CONDITIONS TO
ALLOW MR. MOORE TO ATTEND HIS CHILD'S BABY SHOWER**

Keith Moore, through counsel and with no objection from the government, moves the Court to temporarily modify his current release conditions to allow Mr. Moore to attend his family's baby shower for his unborn child. In support of this motion, Mr. Moore states the following:

1. The government indicted Mr. Moore on May 4, 2021, alleging that he was a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g), on December 5, 2020.
2. Mr. Moore made his initial appearance on that charge on June 1, 2021, *see* ECF No. 8, after being arrested at his job on Friday, May 28, 2021. At Mr. Moore’s detention hearing on Friday, June 4, 2021, the Court released Mr. Moore with several special conditions of release, including that he be in the custody of his mother as his third-party custodian and that he be on home detention with time-outs the probation office approved for employment, education, appropriate medical and mental health treatment, attorney visits, court appearances, and other court-ordered obligations. *See* ECF No. 12 at 2-3. The Court further ordered that Mr. Moore can attend the medical appointments of the child’s mother before the child’s birth, the child’s birth, and his children’s medical appointments. *Id.* at 3.

3. As is customary in our culture, Mr. Moore and his family have planned a baby shower for his unborn child. That shower is scheduled for Sunday, June 27, 2021, from 5:00-8:00 p.m. Mr. Moore has already paid to rent space from a local business in which to hold the baby shower. He asks the Court's permission to attend the baby shower for his unborn child. If granted this request, Mr. Moore would leave his mother's home in her custody, go straight to the shower, and then return home immediately with his mother after the shower ended.
4. Mr. Moore has been on home incarceration with location monitoring and with a third-party custodian since June 4, 2021. Aside from needing a reminder to provide a receipt for his lunch while at work, he has been in full compliance with his release conditions.
5. Undersigned counsel has communicated with Kevin Elliker, who represents the government in this case. Mr. Elliker has no objection to this request.

Thus, Mr. Moore moves the Court to temporarily modify his current release conditions to allow Mr. Moore to attend his family's baby shower for his unborn child.

Respectfully submitted,
KEITH RODNEY MOORE

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